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Mr. Mark Leipert
Department of the Navy
Naval Facilities Engineering Command
10 Industrial Highway, Mail Stop No. 82
Lester, Pennsylvania 19113-2090

Re: Draft Decision Document – RIA 7A
Environmental Baseline Survey
Former South Weymouth NAS
RTN No. 3-2621
July 9, 2001

Dear Mr. Leipert:

The Department has received and reviewed the draft *Decision Document for Review Item Area 7A*, dated June 26, 2001. Please address the attached comments.

If you have any questions regarding this letter, please contact David Chaffin, Project Manager at (617) 348-4005.

Very truly yours,

Anne Malewicz
Federal Facilities Section Chief
Bureau of Waste Site Cleanup

CC: T. Papoulias, S. Weymouth CSO
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**DEP COMMENTS ON
DRAFT DECISION DOCUMENT FOR RIA 7A
FORMER SOUTH WEYMOUTH NAVAL AIR STATION (RTN 3-2621)
JULY 9, 2001**

1. Section 1.2: To fully characterize the nature of the debris disposed in this area, please provide additional information about the debris, and identify the locations and distinguish the contents of the two areas of concentrated debris. During the March 7, 2001 FOST walkover, rusted steel buckets, rusted gallon-size capped containers (paint thinner or cleaning solvent?), heating ductwork, and a 5-gallon container were observed near the northwest corner of this area. Similarly, several cans and parts of domestic appliances (stove and washing machine parts) were observed adjacent to the fence. The distance from the fence to the debris in the northwest corner of the area, approximately 100 feet, and the nature of the material there suggests that this debris was not thrown over the fence or discarded through a break in the fence. The nature of the other debris and proximity to the fence suggest that the other debris was discarded over or through the fence.
2. Section 1.2: Figure 6-4 of the EBS Phase I report indicates that "a large area of half-buried and buried drums" is located in or near RIA 7A; however, the drum area was apparently not evaluated as part of RIA 7A. Consequently, the decision document should explain why the drum area was not evaluated as part of RIA 7A, and should identify the review item area that will include the drum area for evaluation.
3. Section 2.1: The statement indicating "...no ecological exposure pathways or potential receptors were identified for this RIA..." is inconsistent with field observations (the area is wooded upland) and the ecological screening presented in Section 4.2.
4. Section 2.1: In order to confirm that representative surface soil samples were collected, please provide the rationale for locating each of the surface soil samples (e.g., soil underlying a gallon container). To expedite confirmation, DEP staff can participate in a site inspection to directly observe the sample locations and associated targets.
5. Section 3.0: Please submit the laboratory reports associated with this RIA using a CD that includes a cross-reference table that can be used to locate the results from specific samples, or identify the repositories where these reports are available for review.
6. Sections 4.1.1 and 4.2.1: The criterion used to eliminate compounds with elevated reporting limits from further consideration (twice the benchmark value) was not technically justified. The Department recommends that the results from samples with elevated detection limits simply be identified in these sections so that they can be considered with other pertinent information to reach a decision about the need for further sampling.
7. Figures 1 and 2: Please identify the two areas where concentrated debris is located (Section 1.2).